

BORSARI & PAXSON

GEORGE R. BORSARI, JR.
ANNE THOMAS PAXSON

ATTORNEYS & COUNSELLORS AT LAW
5335 WISCONSIN AVENUE, N.W.
SUITE 440
WASHINGTON, D.C. 20015

FACSIMILE NUMBER
(202) 296-4460

TELEPHONE NUMBER
(202) 296-4800

March 24, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Report of *ex parte* presentations
in GN Docket No. 12-268

Dear Ms. Dortch:

Pursuant to Section 1.1206(a)(2) of the Commission's Rules, this is to report that Byron W. St. Clair, President of the National Translator Association ("NTA"), accompanied by undersigned NTA counsel, made oral *ex parte* presentations concerning the above-noted proceeding to the following individuals on March 21, 2013: Commissioner Ajit V. Pai, and Matthew Berry, Chief of Staff, Office of Commissioner Pai; and, in a separate meeting, Alex Hoehn-Sarle, Policy Director, Office of Commissioner Jessica Rosenworcel

The substance of the presentations made in the two meetings was the same. No specific items in the rule making were discussed, and NTA made no recommendations regarding the specifics of the rule making. Dr. St. Clair did, however, identify two concerns of NTA going forward.

First, NTA believes that, in the course of repacking, a translator should not be forced to leave its licensed channel unless and until the spectrum has been purchased by a new user who is ready to start using it. Requiring premature abandonment of such channels would also be inconsistent with the way TV channels 52 to 69 were removed from the TV band.

Second, NTA wishes to remind policymakers that any changes in primary station frequencies will result in the loss of operating TV translators, due to unavailability of alternative channels or to local organizations' being unable to afford equipment needed for a necessary

Ms. Dortch
Mar. 24, 2013
Page two of two

channel change. The loss of operating TV translators will particularly be felt by residents of rural areas dependent on translators for their over-the-air reception of primary station programming. .

Attached is a copy of the handout which was distributed at the meetings.

Respectfully submitted,

/s/ George R. Borsari, Jr.

George R. Borsari, Jr.
Counsel for the
National Translator Association

cc(via email): Ajit V. Pai
Matthew Berry
Alex Hoehn-Sarle



NATIONAL TRANSLATOR ASSOCIATION

OF BROADCASTING, TELEVISION, AND COMMUNICATIONS

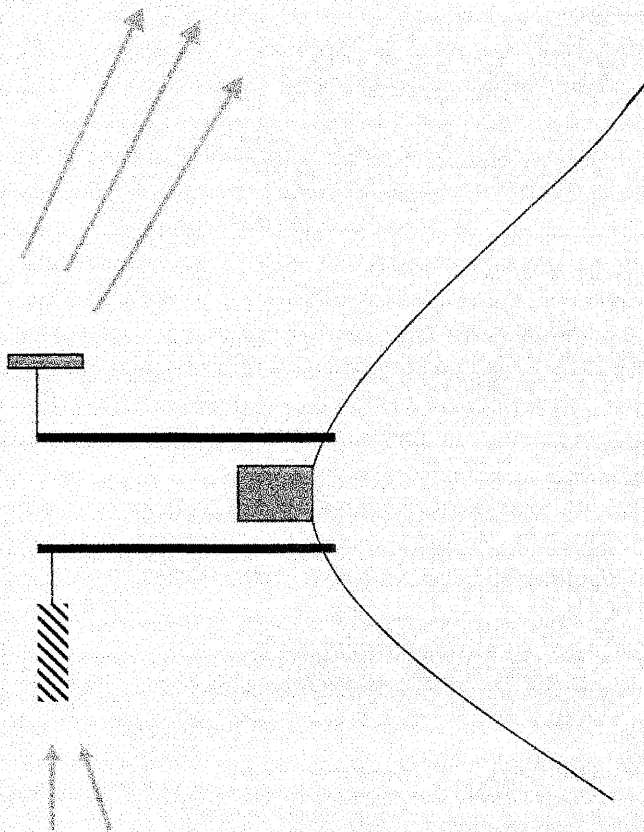
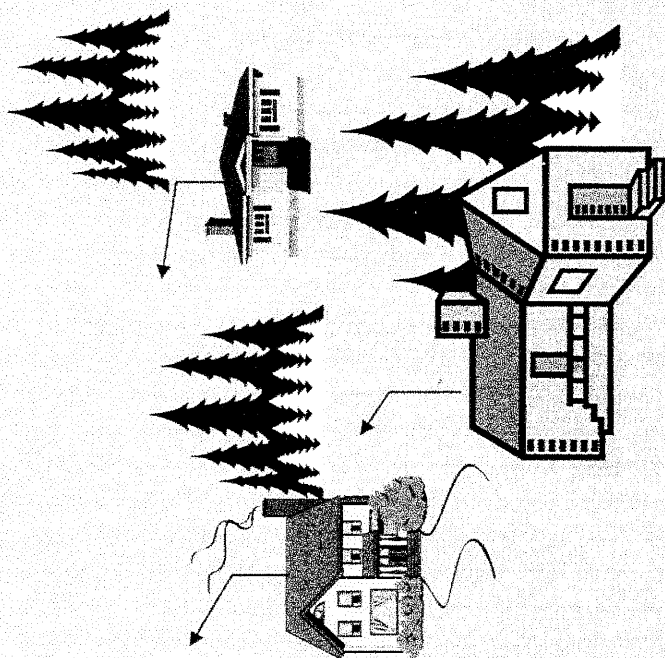
Office of the President 2355 Ranch Drive, Westminster, CO 80234 303-465-5742 stcl@comcast.net

CONCERNS OF THE NATIONAL TRANSLATOR ASSOCIATION

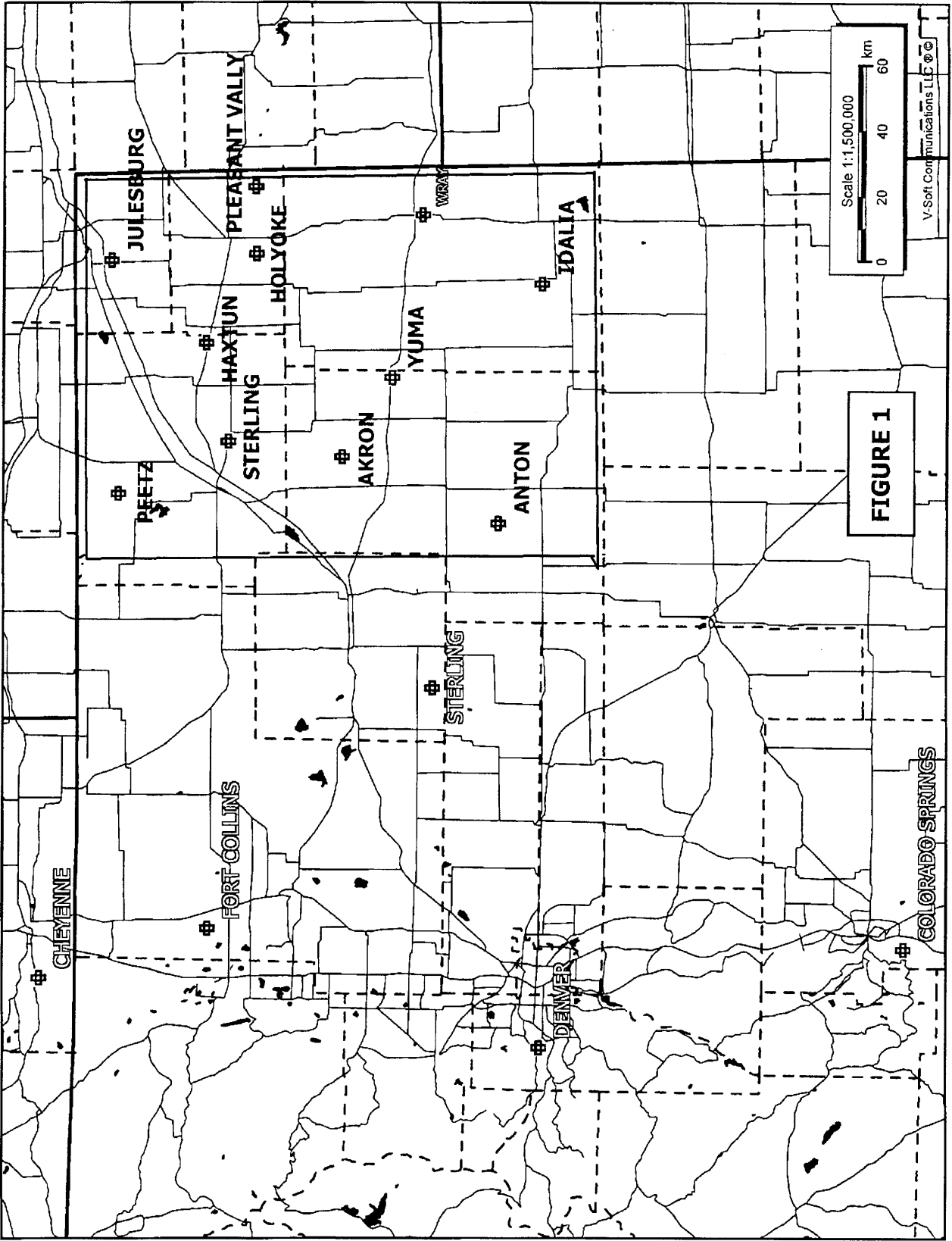
1. Translators should not be forced to leave their licensed channel as the result of repacking unless and until the spectrum has been purchased by a new user who is ready to start using it. This is contrary to the way TV channels 52 to 69 were removed from the TV band.
2. Any changes in primary station frequencies will result in the loss of operating TV translators due to channels no longer being available or local organizations being unable to afford equipment need for a necessary change.

Very truly yours,

Byron W. St. Clair
President
March 21, 2013



000000000000



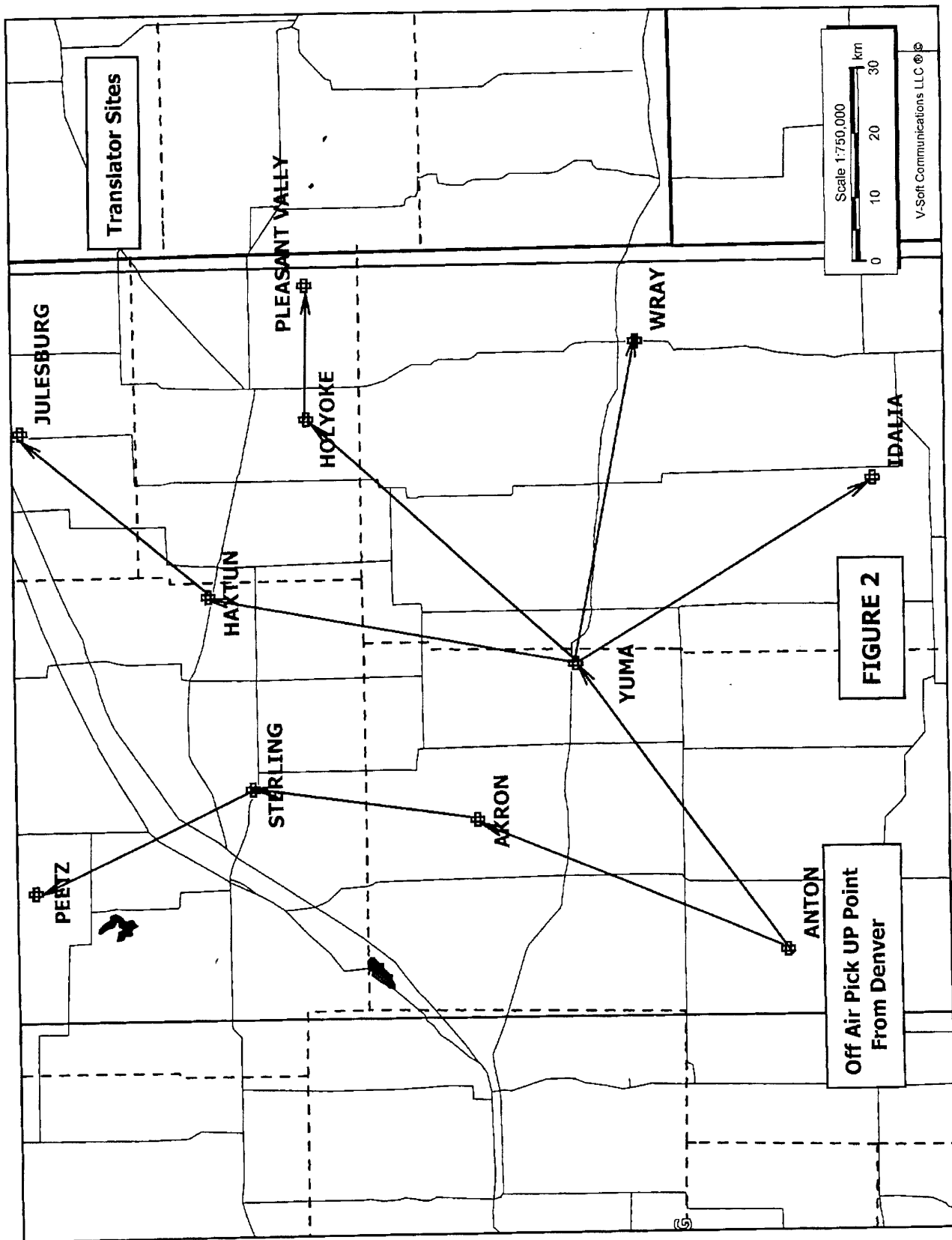


Exhibit 1

This exhibit provides an illustration of a multi-hop, multi-channel translator system eight channels wide and with eleven sites, each translator serving the named communities in northeast Colorado. Figure 1 provides an overall area view. It is a coordinated effort of the five counties that make up the served area.

At the Anton site the following actual RF channels are picked up off the air and passed along through the system. Some translators are carrying more than one primary station through multiplexing.

Ch	35
	07
	09
	32
	13
	18
	34
	19-1
	19-2
	23

The translator output channels within the system have been chosen to prevent internal interference and to protect the input signals at Anton. It has been necessary to also take account of possible co-channel primary station signals particularly from Colorado Springs causing interference with the output channels at Anton and both the input and output channels at Akron and Yuma.

Any change in the primary station channels in Denver, Colorado Springs, Sterling, Fort Collins or Cheyenne will raise the possibility of interference within the system or changes in one or more translator frequencies to protect the new input frequencies.

Primary station channel changes in any of the five cities are almost certain to create a need to change one or more frequencies within the translator system. There can be no assurance that replacement channels within the translator system will be available.